

**AFFIDAVIT**

I, Kelly Liberti, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI for more than 17 years, and am currently assigned to the Cleveland Division's Elyria Resident Agency. While employed by the FBI, I have assisted in the investigation of federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is being submitted for the limited purpose of establishing probable cause that William T. Koch, did use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of transmitting a live visual depiction of such conduct; and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (c). As such, this affidavit does not include every fact known to me regarding this investigation, but will rather seek to summarize the relevant information concerning this investigation. The statements in this affidavit are based in part on information provided by Special Agent Jason Guyton, Immigration & Customs Enforcement/Homeland Security Investigations, Detectives Michelle Hoard and Randy Norton,

Durham, Canada Regional Police Service, Major Crimes, Sexual Assault/Internet Child Exploitation Unit and on my investigation of this matter.

4. On August 17, 2011, your Affiant and Cleveland FBI SA Lisa Hack interviewed William J. Koch and William T. Koch concerning sexually enticing and extortionate text messages sent to an 11 year old Broadway actor. It was determined during the interviews that William T. Koch, aka Billy Koch, was the sole owner/user of an Apple iPhone used to send the text messages to the victim. Billy Koch admitted to Agents he downloaded an application called Textfree and used it to obtain a phone number to send the text messages to the victim. Billy Koch was fully aware of the victim's age at the time the messages were sent, but said he had no intention of following through on his threats. Your Affiant notes Billy Koch has cerebral palsy, which limits his physical abilities.

5. Subsequent to August 17, 2011, several juvenile members of the Billy Elliot cast received text messages of the same nature and wording. The text messages continued for more than a year and became more aggressive. Your Affiant's investigation showed these messages were sent from the Internet account registered to William J. Koch.

6. On September 24, 2012, a federal search warrant was executed at Koch's home for evidence of extortion and sexual enticement of children. At this time, all devices which had the ability to connect to the internet were seized. Agents advised Billy Koch the warrant involved allegations of Koch sending text messages to juvenile members of the Billy Elliot Musical cast demanding naked pictures of the child actors. Koch indicated he understood and stated he wished to speak to an attorney before speaking to Agents. Agents advised Koch to cease all attempts to contact and extort children via the Internet. Koch said he understood and

agreed to not send any further text messages to children. The seized evidence has been submitted for a forensic examination.

7. On December 26, 2012 and January 4, 2013, your Affiant spoke with ICE/HSI Special Agent Jason Guyton. Guyton advised your Affiant he received information from Canadian law enforcement authorities on a new case in which a suspect posed as a 15 year old girl on Facebook and met a 15 year old male in Canada. The suspect enticed the male to produce images of himself masturbating on Skype. In exchange, the suspect sent the male several pictures of a nude teenage girl. The suspect then told the male to have sex with the male's 10 year old brother on camera for the suspect or the suspect would send pictures of the male masturbating to all the male's Facebook friends. SA Guyton told your Affiant subsequent investigation in Cleveland identified the suspect as William T. Koch, 26178 Osborne Rd., Columbia Station, Ohio.

8. On September 19, 2012, [REDACTED], a resident of Oshawa, Ontario, Canada reported to the Durham, Canada Regional Police Service that her 15 year old son, [REDACTED], date of birth XX/XX/1997, was being extorted via the computer. The month and date of birth have been redacted for purposes of this affidavit.

9. According to Durham Regional Police Service reports, on September 9, 2012, [REDACTED] was contacted on Facebook by someone identifying themselves as a 15 year old girl with a Facebook screen name of "Ariella Gold." This person had attempted to have prior online conversations with [REDACTED] in February, March, and August of 2012, however, [REDACTED] never responded. However, on September 9, 2012, at approximately 12:26 am, the two had a brief conversation in which "Ariella Gold" told [REDACTED], "maybe we can skype some time soon. U are super hot and I would strip for you!" When [REDACTED] responded to this message, "Ariella Gold" requested they continue chatting on Skype. They exchanged Skype screen names. [REDACTED]

provided a Skype screen name of "UnknownOriginz", while "Ariella Gold" provided a Skype screen name of "agoldgirlie". The two then exchanged Skype messages requesting sexual acts and pictures from one another. "Ariella Gold" told [REDACTED] her webcam was broken, but sent [REDACTED] images of a naked female teen and claimed it was her. "Ariella Gold" told [REDACTED] she would send him more pictures if [REDACTED] masturbated on webcam.

10. On September 9, 2012, "Ariella Gold" exchanged approximately 193 messages with [REDACTED] instructing [REDACTED] on what to do for "Gold". Messages obtained by Canadian police from [REDACTED]'s account show "Gold" providing the following instruction:

"Move camera down"

"Move hand"

"Now please show ur whole dick"

"Stand in a mirror please"

"All I can see is the head of your dick"

"I wanna see your whole body"

"Stand in front of a mirror and jack off so I can see it happening"

[REDACTED] masturbated on camera for "Ariella Gold", but did not show his face. When [REDACTED] refused to show his face, he received the following message from "Ariella Gold" at 2:23 am:

"If u and [REDACTED] don't have sex tomorrow morning on camera, this will go to all your facebook friends.

Is it totally up to you. Do you want everyone seeing your dick, or do u want to keep it hidden and have no one see it.

And I have all your friends contact info saved, so even if you do go and try to block me, I can still message all of them.

So u either fuck your brother Tomorrow morning and let me watch, or else it goes on facebook.

And in all honesty, those pictures are not of me...And if you do decide to post the pics I sent you as blackmail, go right ahewd.

That profile, and this Skype, for that matter, are all fake. I am a 45 year old dude."

Because [REDACTED] had granted "Ariella Gold" "friend status" on Facebook, it allowed "Ariella Gold" to access information on [REDACTED]'s friends and family, to include his younger brother [REDACTED]. [REDACTED] told his mother about the threat and she reported it to the police on September 17, 2012.

11. According to Durham Regional Police Service reports, on November 13, 2012, [REDACTED] reported "Ariella Gold" was sending Facebook friend requests to her 10-year-old son [REDACTED]. The requests were made on or about November 12, 2012. [REDACTED] told police she was concerned for her family's safety as she was unaware how much personal information the suspect obtained about her family. Shortly afterward, the Durham Regional Police Service reached out to DHS-ICE for assistance.

12. On November 29, 2012, DHS-ICE issued a subpoena to Facebook for all account information for Facebook user "Ariella Gold" from August 1, 2012-November 29, 2012. In response, Facebook supplied email addresses [ariella.gold.188@facebook.com](mailto:ariella.gold.188@facebook.com), [ariella\\_gold@yahoo.com](mailto:ariella_gold@yahoo.com) and [agoldgirlie@yahoo.com](mailto:agoldgirlie@yahoo.com) as being associated with the account. Facebook also provided the IP address for all logins by Ariella Gold as 173.88.171.44 with the last login prior to the issue of the subpoena as November 28, 2012 at 14:47:18 UTC.

13. On November 29, 2012, DHS-ICE issued a subpoena to Skype Communications for subscriber information for user "agoldgirlie" for the time period of August 1, 2012-November

29, 2012. Skype responded the account was created on August 26, 2010 and is associated with the email address agoldgirlie@yahoo.com.

14. On December 3, 2012, DHS-ICE issued a subpoena to Yahoo! For all information pertaining to agoldgirlie@yahoo.com. Yahoo! replied it had no information responsive to the subpoena.

15. On December 7, 2012, DHS-ICE issued a subpoena to Roadrunner Holdco LLC/Time Warner Cable for subscriber information for IP address 173.88.171.174 for the period of November 28, 2012 at 14:47:18 UTC, the date of the last Facebook login. On December 14, 2012, Time Warner Cable responded with the subscriber information as William Koch, 26178 Osborne Road, Columbia Station, Ohio.

16. A criminal history check conducted by SA Guyton for William Koch showed William James Koch, date of birth XX/XX/1954, was incarcerated on sexual assault charges by Brunswick Hills Police Department (BHPD) at the time these messages were sent. BHPD informed SA Guyton of the FBI investigation into Koch's son, William T. Koch. SA Guyton queried the Ohio Department of Rehabilitation and Correction website for Koch and found Koch was released November 29, 2012.

17. Your Affiant searched various records indices for information regarding WILLIAM T. KOCH and the address 26178 Osborne Road, Columbia Station, Ohio.


a. Public records report accessed through Lexis Nexis,, a public records database that can be accessed and searched over the Internet, for WILLIAM T. KOCH shows a full name of WILLIAM T. KOCH, a date of birth xx/xx/1989, and an active address of 26178 Osborne Rd., Columbia Station, Ohio. The month and day of the date of birth has been redacted for the purposes of this affidavit.

1:13 MJ 9010


b. Ohio BMV records indicate that WILLIAM T. KOCH has a current Permanent ID Card, but no driver's license, maintains a current address of 26178 Osborne Road, Columbia Station, Ohio, and a social security account number xxx-xx-6857. The first five numbers of the social security account number have been redacted for the purposes of this affidavit.

**CONCLUSION**

18. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that William T. Koch has violated Title 18, U.S.C. § 2251(a), Sexual Exploitation of Children.

  
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Kelly Liberti  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me this 10<sup>th</sup> day of January, 2013.

  
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William H. Baughman, Jr.  
United States Magistrate Judge